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October 28, 2021

VIA ECF

Hon. Judge Valerie E. Caproni
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

MEMO ENDORSED

USDC SDNY
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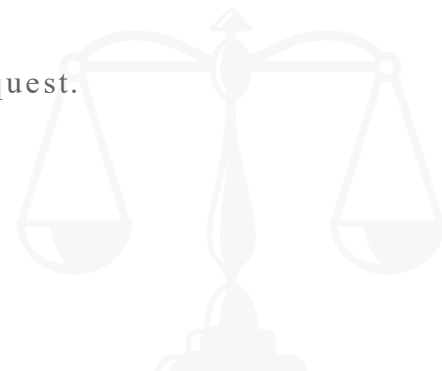
Re: Tavaréz v. Hill to Grove, Inc.
Case No. 1:21-cv-05700-VEC

Dear Judge Caproni,

The undersigned represents Plaintiff Victoriano Tavaréz (hereinafter "Plaintiff") in the above-referenced matter.

The initial conference for this matter is set for November 5, 2021. Defendant was served on October 21, 2021 (see Document No. 6), and, as such, Plaintiff has not been in contact with Defendant yet. Therefore, Plaintiff respectfully requests, in accordance with Your Honor's rules, for the initial conference to be adjourned to November 26, 2021, or a date thereafter more suitable to the Court. The additional time is being requested to give Defendant an opportunity to contact and communicate with this office, and for the Parties to submit the necessary joint letter and case management plan in preparation for the initial conference. This is Plaintiff's first request for an adjournment and as Defendant has not yet appeared, it is not requested on consent.

Thank you for your time and consideration of the above request.





Mars Khaimov Law, PLLC

Sincerely,

/s/Mars Khaimov

Mars Khaimov, Esq.,

Application GRANTED. The initial pretrial conference scheduled for November 5, 2021 is adjourned to **December 3, 2021 at 2 p.m.** The parties' joint submission is due by **November 24, 2021**. The parties should appear for the conference by dialing 888-363-4749, using the access code 3121171 and the security code 5700.

Plaintiff's counsel is admonished for not abiding by the bolded language in this Court's July 6, 2021 Notice of Initial Pretrial Conference that **Plaintiff is encouraged to serve defendants promptly**. Dkt. 5, ¶3.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

10/28/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

